

Exhibit C

bitcoin site manager and operator.

3. In this Affidavit, and the bitcoin mining industry, the term “ASIC” stands for “Application-Specific Integrated Circuits.” ASICs are computer chips that combine several different circuits all on one chip – it is a “system-on-a-chip” (SoC) design – allowing the chip (and the computer or overall hardware device that the chip powers) to be custom programmed to combine several related functions that together carry out a specific overall task. ASICs are custom programmed to mine bitcoin and other cryptocurrencies. I refer to ASICs as “bitcoin mining computers” or “bitcoin miners” in this Affidavit. Please note, this is not technically accurate as there are different types of ASIC chips and computers, and ASICs can be used to mine other cryptocurrencies with proof of work (PoW) protocols, but for simplicity of nomenclature and the matters relevant my role as the North Range Site Manager for BCB, I refer to ASICs in this Affidavit as “bitcoin miners” or “bitcoin mining computers.”

4. In August 2022, I came across a job posting online by Bison Blockchain for a “Site Manager” position for an industrial scale bitcoin mining operation that was about to begin construction in Cheyenne, Wyoming.

5. I applied to BCB’s “Site Manager” job posting by emailing my resume (*see* “**Exhibit A**”).

6. My resume accurately summarizes my experience and qualifications. I am uniquely qualified and competent to be an industrial scale bitcoin mine Site Manager. My qualifications include:

- a. My experience and commitment to the bitcoin mining industry since 2013 (considered the “pioneer era of Bitcoin mining”). Bitcoin miners who have been mining Bitcoin since the “pioneer era” are considered to be bitcoin mining veterans with the maximum amount of experience and tenure. [It is noteworthy Bitmain

launched its Antminer S1 in November 2013. I have been mining Bitcoin prior to Bitmain launching its first bitcoin mining computer (*i.e.*, ASIC)].

- b. I have been mining bitcoin for more than a decade.
- c. Since 2013, I have supported the bitcoin network through procuring and self deployment of CPU, GPU, and ASIC hardware as the network grew and evolved, amassing just over 3 megawatts of self-consumed power for mining bitcoin directly under my management.
- d. Additionally, I was the Site Manager, with the job title “Director of Operations and Business Development,” for 10 megawatts of digital mining deployments in Arizona with Fortis Mining. I am a highly competent and experienced industrial scale bitcoin site manager and operator.
- e. As the Site Manager for Fortis Mining, I directly managed more than 4,000 ASICs.
- f. The 4,000+ bitcoin miners that I managed as the industrial bitcoin mining Site Manager of Fortis Mining are the same brand as most of the bitcoin miners now at the North Range facility (Bitmain Antminers).
- g. I have launched and defined departmental training procedures, including unpackaging and racking of bitcoin miners, standard operating procedures for monitoring, maintenance, troubleshooting, heat control and dissipation, software optimization and updates, on-site bitcoin miner repairs, and overall industry practices to increase network contribution and uptime of thousands of bitcoin miners.
- h. I have expert knowledge in bitcoin mining management software including Foreman, HiveOS, BTC Miner, BFG, CGMiner and others.

- i. I have expert knowledge and experience with multiple brands, models, and generations of bitcoin miners including Bitmain's Antminer series, Goldshell, Canaan, and MicroBT.
 - j. I have years of hands-on experience in planning infrastructure improvements, specifically related to and in deploying various types of industrial scale bitcoin mining operations.
 - k. I have coordinated and managed solo and pool mining to accomplish objectives and boost long-term bitcoin mining profitability at an industrial scale.
 - l. I have years of direct hands-on experience with industrial scale bitcoin mining operations and site management operating the three types of bitcoin mining computers (air cooled, immersion, and hydro).
 - m. Air cooled is the type of bitcoin mining at the North Range site as of March 2023 when BCB was removed as the operations and maintenance service provider for the North Range site, and when I lost my employment; and
 - n. I have knowledge and experience with the second type of bitcoin mining ("immersion") where ASICs are submerged in a dielectric fluid, as well as the third type of bitcoin mining called "hydro," utilizing water for cooling in an open or closed loop system, the type of bitcoin mining that Bitmain described it intended to do at the Campstool site.
7. Bitcoin miners and industrial scale Site Managers with my experience and expertise are exceptionally rare. By my estimate, there are no more than 15 individuals in the United States that have my professional skills, expertise, competency and experience as a Site Manager for industrial scale bitcoin mining operations larger than 10MWs of energy consumption or 4,000+ bitcoin miners under management.

8. With industrial scale bitcoin mining, there is a point that the amount of scaling becomes negligible to the experience and skill level required to manage it.

9. From my experience, when a bitcoin mining Site Manager has successfully managed greater than 5 MWs of ASICs and/or more than 3,000 bitcoin miners, he or she has acquired the skills to scale mining operations to 50+ MWs and 10,000+ bitcoin miners.

10. After applying to the Site Manager position for BCB, I was contacted by BCB, and then interviewed on August 29, 2022 with BCB. I then had a second interview on September 10, 2022.

11. I received an offer to be hired for the Site Manager position on September 13, 2022, and I signed the offer on September 19, 2023 with an official start date of October 17, 2023.

12. The annual starting salary for the position was \$85,000 and I was paid bi-weekly by direct deposit starting November 4, 2022.

13. The amount of compensation for the role as Site Manager with BCB did not entice me as much as the opportunity to work with the right team. From my initial discussion with the BCB founders, I found their team to be detailed, proactive, capable, knowledgeable, and recognized the opportunity in expanding much further in bringing my expertise within the bitcoin industry to BCB. I saw a unique opportunity in aligning myself with BCB.

14. I was hired to serve as the Site Manager for the project as an employee of BCB. My job duties were focused on Phase 2 (Operations & Maintenance Phase) work (specifically, the deployment of ASICs, and managing and operating the site after completion of the infrastructure and power utility improvements). To add value and help out before Phase 2 began, I actively contributed my knowledge and expertise related to industrial bitcoin mining sites

during Phase 1, though I had no responsibility to do so. I wanted to help advance the project as quickly and safely as possible during Phase 1 (Build & Implementation Phase) to get to Phase 2.

15. When I was hired by BCB, MineOne Wyoming had already contracted with Shermco and CEGEN, and I was informed of the site design, development, and construction plan for CEGEN to build ten 4.5 MW Titan containers (“data centers”) for the site at North Range.

16. When I was hired by BCB, I was informed of BCB’s plan to hire locally and I supported this initiative. I helped draft and review job postings seeking local applicants to join the team and work under my direction and supervision.

17. I made my first (of five) trips to Cheyenne on November 1, 2022 to November 3, 2022.

18. During my first trip to the North Range site, I observed the progress that had been made since the project had broken ground on or about October 12, 2022. I observed the site was leveled, helical piles had been installed, the first data center skid had been installed, walls were going up on the first data center, and the duct bank for the data centers’ electrical conduits had been dug and conduits installed.

19. With the North Range site breaking ground on October 12, 2022, any notion that the North Range site could have, or should have, been completed by October 31, 2022 or anytime soon thereafter is absurd given how slow Shermco and CEGEN were to staff up and begin work on the site, how slow Shermco and CEGEN were sourcing construction material to the site, and how there was no way electrical power could have been supplied to the site by Black Hills due to unforeseen delays in sourcing materials.

20. I observed that Erick Rengifo from Terra Crypto was nowhere to be seen. He never came to the North Range site. It was my understanding that MineOne Wyoming had contracted with CEGEN and Shermco, and that CEGEN was responsible for constructing and

overall delivery of the data centers and Shermco was responsible for site construction and overall coordination and delivery of the project as the general contractor.

21. My second trip to Cheyenne was December 8-11, 2022. During this trip I assisted unloading and securing the first load of KOI C16 bitcoin miners (white label ASICS) that had been shipped from MineOne's Georgia site. I observed delays mounting from construction and procurement related issues with CEGEN and other MineOne contractors and vendors. There was only one (out of 10) data center buildings being worked on.

22. I was fully aware MineOne Wyoming had contracted with Shermco and CEGEN upon my second visit to the site. At this point, I started to become concerned about MineOne Wyoming's contractors' ability to perform, construct, and deliver a site ready to mine Bitcoin anytime soon.

23. I was made aware by BCB executives on December 17, 2022 that multiple Chinese nationals and workers from MineOne's bitcoin mining site in Georgia had arrived unannounced to the North Range site. I was told they "showed up at the gate and demanded to come on site."

24. On December 19, 2022 I was made aware one of these Chinese nationals who had shown up – "Huaili Zhang," who went by the name "Wiley" – was demanding I (BCB's Site Manager) fly in the next day to meet with him and someone else named "Jack" (Cho Zhu).

25. I was not able to travel to Cheyenne on such short notice with Christmas approaching. Emory Patterson asked if a video call would work, but these two individuals – Wiley and Jack – insisted on an "in person" meeting with me.

26. I was made aware on December 26, 2023 that MineOne – Wiley and Jack specifically – were making demands for me to return to Cheyenne for an in-person interview by the end of the week. I booked flights for my third trip to Cheyenne for December 30th and 31st.

27. On December 30, 2022, upon arriving in Cheyenne, I went to the North Range site, and I was ordered into an interview with Wiley and Jack. It was quite shocking, unexpected, and very unprofessional. These two individuals insulted and degraded me in Chinese through their translator, Ziyao. Oftentimes, Wiley was yelling and throwing his hands around erratically for minutes, only for Ziyao to then translate a few words, a short sentence, or a short question to me.

28. I thought I was coming to meet with MineOne team members to prepare for Phase 2, but the entire meeting was a steamrolling session where Wiley and Jack were degrading and minimizing my experience and skills as a bitcoin miner and site manager. Wiley and Jack spent considerable time and effort not only insulting and degrading me, but also making it clear ‘how good they were,’ ‘how experienced they were,’ and ‘how many bitcoin sites they had managed.’

29. The December 30, 2023 “interview” was one of the most unprofessional and disrespectful meetings of my life.

30. As the insults and degrading continued, it became apparent what they were doing was intentful and planned. I became interested to understand just who these individuals were who claimed they knew more than me about bitcoin mining and proclaimed with such certainty they had more experience and expertise than me.

31. I inquired about their ASICs—what kind and how many they had, what kind of network setup and monitoring software they used, and I even asked some very basic questions they should have very easily answered. By dodging their responses to me, and in other cases, admitting they simply didn’t know, it was obvious I possessed greater knowledge, experience, and expertise as an industrial scale bitcoin miner.

32. I began to wonder why these Chinese individuals were so focused on degrading and disrespecting my experience. Through translation, they said I had no idea what I was talking about, and that I did not know enough to be involved at the North Range bitcoin mine.

33. After the December 30, 2023 “interview” I met with the BCB executives; they were just as shocked as me about what was being said. BCB’s executives assured me that BCB had a contract with MineOne Wyoming and that BCB was the operations and maintenance service provider, and BCB’s contractual obligation was to do “everything reasonable in BCB’s control” to help during Phase 1, and that my job duties and responsibilities would begin as the Site Manager under Phase 2, when North Range was energized and began mining bitcoin.

34. I later found out from BCB executives that Wiley had demanded BCB terminate my employment when I could not reasonably fly out December 20, 2022 for Wiley and Jack's impromptu demand for an in person interview.

35. After traveling to Cheyenne – only to be disrespected and degraded by Wiley and Jack – I became even more interested to know who these individuals were and further understand the experience they claimed they had in managing and operating bitcoin mining sites.

36. They made references to “Bit Origin” in our meeting. I took it upon myself to look into this Bit Origin entity they mentioned. I found the Bit Origin press release from December 22, 2023. It said, “Bit Origin has a total mining hash rate of 308PH/s with 3,190 miners installed, as of November 30, 2022.” The press release said “the Company (Bit Origin) had ongoing operations in two mining sites one in Macon, GA, 9.49 MWs and one in Marion, IN, of 5.3 MWs.

37. My experience aside, I quickly validated and confirmed that I was just as, if not more experienced, than anyone individually, or collectively, at MineOne / Terra Crypto / Bit Origin. Their total operation was 14.9 (9.49 + 5.3) MWs across two sites with 3,190 bitcoin

miners. I had managed 13MWs and over 4,000 bitcoin miners. [Note: MineOne/BitOrigin's older model bitcoin miners are less efficient and require more energy to run].

38. After my first meeting with Wiley and Jack, I had the impression their intent to insult and degrade me was being done to get me to quit my job with BCB and not come back to Cheyenne.

39. Wiley told me through translation, 'they (MineOne/TerraCrypto/BitOrigin) had everything covered, and I wasn't needed.' Hearing this, I was shocked since I thought being the Site Manager was exactly what I had been hired to be. My radar went up.

40. I shared my shock and concerns directly with Michael Murphy. Michael informed Emory Patterson and Neil Phippen. BCB's executives were at loss for words at the "interview" that had occurred. They assured me they would raise the occurrence and issue with the MineOne team on their regularly scheduled thrice weekly 6 AM video conference.

41. From January 1, 2023 to January 9, 2023, I was in Phoenix and received updates from BCB.

42. On January 10, 2023 I returned to the North Range site. In an effort to do everything BCB could do to advance the project, I assumed and assisted with Phase 1 to help advance the project and get the North Range site up and running for Phase 2, when my duties and responsibilities as the Site Manager would officially begin.

43. When I returned to the North Range site I was greeted by Sean Murphy. Sean had been hired by BCB to be the Site Administrator and do everything reasonable within BCB's control to advance and help with Phase 1.

44. Sean Murphy and I began working together to do everything reasonable within BCB's ability and control for Phase 1 and to prepare for Phase 2 (site operations and management under my leadership, management, and direction). Sean, BCB executives, and I

regularly provided assistance well beyond BCB's contractual scope of work in the spirit of completing Phase 1 and moving to phase 2.

45. By the time I returned to North Range on January 10, 2023, it was clear that MineOne's representatives at the North Range site – Wiley and Jack – knew I was a qualified and experienced Bitcoin miner and site operator equal to or greater than they were. For a few days, it seemed my presence intimidated them, and they steered clear of me when they came to the North Range site.

46. During January 2023, MineOne representatives did not take kindly to my presence at North Range. I knew what was going on with the issues and delays from CEGEN, Shermco, and other MineOne contractors, and I identified and understood the issues and faults with the data center design—issues including faulty hoods and venting on the data centers, leaking roofs, and poor design with racking, electrical, and networking configurations.

47. On January 11, 2023, problems arose with leaks and the venting hoods. When Sean Murphy and I broached the issues – faulty designs and construction by CEGEN – I was called into another meeting with Wiley. He asked me about progress with construction and site design – trying to suggest it was BCB's and my fault. After I answered and shared my thoughts about Shermco and CEGEN, he began insulting me in a similar fashion to the meeting/interview on December 30, 2022. It was very frustrating to have BCB blamed for CEGEN and Shermco failing to meet CEGEN's and Shermco's respective contractual obligations to MineOne Wyoming. MineOne projected its frustration with CEGEN's and Shermco's delays and deficiencies onto BCB, even though BCB was the party doing everything within its control, and even things outside its original scope, to speed up progress on Phase 1.

48. Throughout January and early February 2023, Wiley would show up at the North Range site in an angry and demanding mood. If there was any issue or problem, he would direct

it at me. Michael Murphy tried to explain to Wiley each party's contractual obligations, and that I was hired by BCB for Phase 2 management of operations and maintenance, and that I was there to help in any way that I could during Phase 1. Wiley did not care. It seemed to me he really wanted me to leave the North Range site.

49. When I or BCB executives challenged Wiley in any way, he would say, through translation, that he thought we were doing things the wrong way and he could do it better "his way." It didn't matter how many times we explained to him that MineOne (not BCB) had contracted with CEGEN and Shermco and BCB was doing everything reasonable within its control to help complete Phase 1. Regardless, Wiley insisted everything was always BCB's fault and something he could do better his way. For example, Wiley demanded a total redesign and reengineering of the data center buildings including the fans and electrical. None of his demands were in the approved site and engineering plans. Wiley never understood that what he was demanding would have resulted in more delays, more costs, and would push the project completion back even further. Wiley's lack of understanding was directly attributable to his lack of experience and knowledge building industrial mining sites and construction in the United States, where in the United States you need to get permits and follow approved construction plans, but in China, you do not.

50. Wiley was intent on discrediting and trying to make BCB and me "responsible" for the problems, issues and delays. Unfortunately, for his plan to do that, I knew exactly what I was talking about, and had many years of experience and expertise. Wiley couldn't put the issues, problems and delays off on me or BCB. I wouldn't let him. This seemed to anger and frustrate him greatly especially because the issues were very clearly resulting from contractors and vendors MineOne had vetted, directly contracted with, and hired.

51. I continued to help with Phase 1, and I prepared for my job duties and responsibilities to begin with Phase 2.

52. During Phase 1, I helped BCB meet its contractual obligations to MineOne by providing my knowledge, expertise and skills as an industrial scale bitcoin site manager for the following:

- a. All reasonable related activities within BCB's and my control to enable MineOne and other users of the Facilities to conduct digital currency mining activities in a proper and timely manner; and
- b. Ensuring that all improvements were developed in accordance with the approved construction and engineering documents; and
- c. Project management and services to support MineOne responsibilities as specified in the Budget.

53. I was also very familiar with BCB's Phase 2 contractual obligations to MineOne and how my position as Site Manager was central to BCB's obligations that would begin once the site was energized and Phase 2 began. As such, most of my activities involved planning and preparation to meet the following contractual obligations in my role as the Site Manager:

- a. Hosting MineOne's digital currency mining Facilities; and
- b. Management of daily operations of the Facilities, including all budgeted maintenance and basic engineering (to include power management, ensuring internal loss of power and scheduled and unscheduled outage is minimized, that all facilities work properly, provide basic status checks on miners and plan and implement regular maintenance of Facilities and Miners in accordance with sound operating procedure) and other support to ensure the Miners are capable of operating at full nameplate capacity; and

- c. Full time security of the Facilities, including maintaining and monitoring CCTV and security cameras that can be accessed remotely by MineOne and Terra; and
- d. Contracting all insurance coverage to ensure a safe work environment for its employees and Subcontractors (if any) in compliance with occupational health and safety regulations; and
- e. Repairing (if possible) and exchanging damaged Miners after consultation with MineOne and Terra; and
- f. Maintaining records of all transactions and events in the Facilities including all scheduled and unscheduled outages and curtailments; and
- g. Preparing the Budget with Terra in consultation with MineOne; and
- h. Hiring personnel or Subcontractors needed to ensure that MineOne's operations are always conducted properly and efficiently; and
- i. Providing Terra with all information in relation to the Facilities, the Miners, the Containers and operations generally as and when requested; and
- j. Supplying information to Terra regarding any potential problems in terms of services, operations or any potential action that can affect the Miners; and
- k. Tracking daily all costs and expenses for the Power Supply and evaluate and secure lower price supply and coordinate with Terra to ensure the Power Supply tariff and fees paid are the most favorable and cost-efficient; and
- l. Providing any other operational activities reasonably required by MineOne in consultation with BCBC and/or Terra; and
- m. Payment of all operation and maintenance costs ("O&M Costs") specified in the Budget as and when the same fall due.

54. One of my primary job responsibilities was to build a local team to execute on BCB's contractual obligations to MineOne and Terra to manage and host MineOne's mining facilities.

55. I was tasked by BCB executives with recruiting local individuals to be hired as bitcoin mining technicians and then training those individuals with all the knowledge and skills necessary to perform BCB's contractual obligations to MineOne.

56. On January 17, 2023, Emory Patterson and I conducted an interview with Dennis Grant. Mr. Grant had been inquiring about working for BCB for several weeks.

57. Mr. Grant was local, qualified, and he was eager for the opportunity to be involved in a large Bitcoin mine. After the interview, I told Mr. Murphy and Mr. Patterson I thought Mr. Grant was qualified and experienced and that he should be hired.

58. Mr. Grant was hired and joined the on-site North Range BCB team under my direction and supervision.

59. Mr. Grant, Sean Murphy, and I continued doing everything in our control to advance Phase 1 while at the same time making preparations for Phase 2.

60. On January 20, 2023, Wiley and Mr. Zhu pulled me into a meeting at the end of the day. Wiley and Mr. Zhu again probed me with questions, concerns, and insults about my credentials and experience to implement North Range's networking, and my opinions and advice regarding completion of Phase 1.

61. I told Wiley and Mr. Zhu I was hired and working for BCB for Phase 2 operations and maintenance of the North Range site, and that I was focused on building the team for when North Range was ready to start mining.

62. Wiley again assigned all of the things going wrong with CEGEN, Shermco, and MineOne's other contractors to me and BCB. He wanted me and BCB to be the "responsible

party,” but he never would acknowledge – or seemed to understand – that MineOne had qualified and contracted with CEGEN and Shermco directly. BCB executives told me and showed me the contracts further supporting that BCB was not the responsible party for delivery of MineOne’s contractors’ (Shermco, CEGEN, CLFPC, etc) obligations to MineOne since BCB could not control those parties due BCB not having a contract with them. Michael Murphy explained to me that Terra Crypto was ultimately responsible for the timeline and delivery and he showed me the language in BCB’s *Consulting Services Agreement* with Terra Crypto indicating such. But, Terra Crypto’s representative, Erick Rengifo, was nowhere to be seen. He had stopped attending the thrice-weekly calls and never once came to the North Range site.

63. I also saw online where Erick Rengifo had resigned as the Chief Strategic Officer of Bit Origin on December 31, 2022.

64. MineOne’s contractors – Shermco and CEGEN and their staff and subcontractors – were the ones making mistakes and not fulfilling their contractual obligations to MineOne. It was very clear to me the design faults and ever occurring delays at North Range were almost entirely caused by CEGEN, and to some degree, Shermco.

65. To put it simply, CEGEN was terrible. CEGEN was the primary cause of the delays. BCB and I thought surely MineOne was going to take legal action against CEGEN for all the issues and delays CEGEN was causing. MineOne even said they were going to sue CEGEN.

66. The design of CEGEN’s TITAN data centers was terrible and they made error after error with construction and the electrical buildout of the data centers. Despite BCB’s efforts to engage CEGEN for more on-site project support, CEGEN reluctantly provided only one team member at the North Range site to oversee CEGEN’s obligations—one?! And that one team member wasn’t even consistently there; he traveled back and forth to Canada. CEGEN had a second team member come to the site, but he was only there for a few days.

67. CEGEN's "data centers" were structures designed for the oil and gas industry to house generators and definitely not for bitcoin mining. As an industrial scale bitcoin miner, I couldn't believe MineOne had selected these CEGEN structures given the "experience" and "expertise" they claimed to have. It was obvious to me MineOne's and Terra Crypto's leadership had no idea what they were doing in terms of mining bitcoin at scale.

68. On January 19, 2023, I was speaking with Ziyao about faulty site designs and CEGEN failing, and Ziyao told me everyone needed to hurry up because data centers #1-#6 will be "Bitmain hosted." From this point in time on, everything became very focused on finishing data centers #1-#6.

69. On January 26, 2023, I spoke with Wiley at the North Range site. I learned from him that 10,000 new Bitmain bitcoin miners were scheduled to arrive to North Range around February 25, 2023.

70. I was invited by Wiley and Ziyao to dinner at Texas Roadhouse. I met Joey Darwell (CryptoKnight) at this dinner. This was the first time Wiley said, through translation, it was "nice that bitcoin miners can get together and become friends." Wiley was sharing details about the BCB/MineOne North Range project with Joey. Joey took advantage of this and said he would introduce MineOne to SystemMEC "for a cut of the deal" (*i.e.* a commission to introduce SystemsMEC to Wiley and MineOne). Wiley was telling Joey and me he could get us good pricing on Bitmain bitcoin miners. Wiley invited both of us – Joey and me – to China and said he would show us around to have a good time.

71. On January 31, 2024, I told BCB executives that issues with Ziyao and Wiley needed to be addressed; they were at North Range touring and sharing information protected by Non-Disclosure Agreements with representatives of CryptoKnight (a competitor to BCB) and SystemsMEC. It was evident to me they were trying to sabotage BCB's standing as the North

Range operations and maintenance service provider for Phase 2, and as such, my position as the Site Manager. I traveled back to Arizona on January 31, 2023 to make preparations for my full-time move to Cheyenne as the Site Manager during Phase 2. I worked remotely from February 1, 2023 to February 11, 2023, and I returned to Cheyenne and the North Range site on February 12, 2023 to continue helping with Phase 1 and preparing for Phase 2.

72. In early February, I researched Bitmain's proposed hydro mining design and applications for Campstool. BCB's executives told me that MineOne representatives had said "Bitmain wants to do hydro at Campstool" so I engaged with my experience and expertise as an industrial scale bitcoin site manager.

73. I told BCB's executives on February 5, 2023 and February 13, 2023 that I didn't find Bitmain's hydro site design well planned and that what Bitmain was wanting to do was a bad idea. The problem wasn't the hydro system, it was Bitmain's solution. Bitmain wanted to go with the open loop cooling, which is the less ideal option of the two cooling designs.

74. Bitmain's open loop solution was flawed and wasteful; my experience and expertise with immersion and hydro mining in Arizona helped me understand all this and know a better solution.

75. As I researched Bitmain's hydro mining, I began to get the feeling that Bitmain's involvement was far more concerning and a bad thing for BCB than it was a good thing. I knew Bitmain had an industry reputation for steamrolling companies and doing everything they could to work "with Chinese and not Americans." My guard went up, but I continued doing everything I could to advance Phase 1 and prepare for Phase 2.

76. After the February 13, 2023 engineering call with Bitmain's engineer, Wiley's attitude towards me changed dramatically. It was as if he (and/or Bitmain) realized their plan to disparage me – as a means to get me to quit and leave North Range — was not going to work,

and/or they realized I was experienced, qualified, and a trustworthy Site Manager to have at North Range.

77. On February 14, 2023, Wiley and Ziyao suggested to me that I should consider coming to work for MineOne. Wiley and Ziyao were also telling Dennis Grant that he, too, should come work for MineOne.

78. On February 23, 2023, Wiley arrived unannounced at North Range with new Chinese foreign nationals. Through translation, Wiley identified the new individuals by their Anglicized names, Jason and Eason. Along with Mr. Zhu – the site operator from Indiana – the new individuals and Wiley went straight to my office and began testing me about networking design. More than anything, it was an interrogation!

79. I answered all their questions and demonstrated my knowledge and experience about networking. After the interrogation session, everyone left satisfied in a friendly way that had a new sense of work-camaraderie that was very different from the disparaging and dictatorial behavior from the prior two months.

80. On Friday, February 24, 2023, Wiley invited me to his AirBnb at 210 E Pershing Blvd for dinner and drinks. Wiley told me (through Ziyao's translation) that "BCB did not know what they were doing," and now, to my surprise, Wiley started complimenting me about my "impressive tenure as a bitcoin miner" and "my credibility as a Bitcoin miner." After drinking a considerable amount of whiskey, Wiley really opened up. He told me I was an "elite like him," and a "part of the bitcoin family" but that "the BCB guys needed to go."

81. As dinner went on, Mr. Zhang got more and more drunk, and he said more and more things. I listened. He said "BCB did not know what they were doing" and "They (MineOne/BitOrigin/Bitmain) knew that BCB had never built a Bitcoin mining site before."

Wiley also carried on to tell me MineOne had sent him out to Cheyenne to make sure the site got built.

82. Instead of pushing back or making any trouble, I let Wiley talk. Now, he trusted me. He realized I was a legitimate, skilled, and qualified industrial bitcoin site manager. In his words... I was an *elite like him*.

83. After the February 24, 2023 dinner, Wiley later followed up with me and said he *now* had “full confidence in me” operating the North Range site. Wiley said he “lacked confidence in BCB” but did not provide any reasons for why he lacked confidence in BCB.

84. I could see what was going on. Wiley was trying to separate me from BCB. He knew full well I worked for BCB as a full-time BCB employee. Having confidence in me should have been the same thing as having confidence in BCB. But he wanted to isolate me and bring me to MineOne’s side in terms of loyalties and allegiances.

85. I spoke with Sean Murphy about all this and we decided to see what else Wiley would say privately when Sean and the BCB executives were not around.

86. It seemed now I had been welcomed into the inner circle of Chinese bitcoin miners and proven I could be a trusted part of the MineOne/BitOrigin/Bitmain team. I had passed their trust test.

87. From February 25, 2023 through March 1, 2023, I led the coordination and executed logistics and warehousing for the arrival of 9,800 S19XP bitcoin mining computers from Bitmain.

88. When the new Bitmain miners arrived, I drove the forklift and unloaded thousands of new Bitmain miners worth millions of dollars. As the unloading occurred, several new Chinese foreign nationals arrived. We were told they were “from Bitmain” to oversee the arrival of the Bitmain bitcoin miners.

89. On February 27, 2023, Wiley – through translation – informed me that Henry had come to the site to do the networking portion of the project. This was concerning and unusual, given that MineOne had already signed a contract with BCM Site Services to provide networking services.

90. On February 27, 2023, I was again invited to Wiley's AirBnb for dinner and drinks. Wiley asked me probing questions about my income and payments from BCB, and conveyed to me I would be taken care of financially if I was a part of *their* team.

91. Mr Zhang thought he could buy my loyalty and allegiance. He was wrong. I stayed quiet and kept my thoughts and loyalties close to the vest.

92. My earlier concerns and suspicions had been confirmed. It was clear Wiley and MineOne wanted me to leave BCB, join their team, and use that as a way to remove and get rid of BCB.

93. At the dinner on February 27, 2023, Wiley told me, through translation, that BCB was now “unneeded” and “dead weight.” Wiley expressed that BCB would be making less money than what BCB projected to make. Wiley said he was “taking over the site” and “his team was going to manage the site.”

94. On March 3, 2023 there was an “orientation meeting” that included BCB team members (myself, Emory Patterson and Sean Murphy), SystemsMEC, and multiple members of MineOne/BitOrigin/Bitmain.

95. Wiley spent the orientation meeting yelling and ranting and carrying on. He demanded to know what date the site would be ready and energized. SystemsMEC did not know and could not commit to a date because of missing materials CEGEN and Shermco failed to procure. Then, Wiley spent time erratically scribbling on a white board and saying that BCB was the “responsible party” for all of the problems and delays, while, at no time acknowledging that

all the problems and errors were caused by CEGEN or Shermco, MineOne's contractors. The orientation meeting turned into Wiley dumping everything he could on BCB, and then, after removing his hardhat and safety vest, he slammed them on the table and stormed out of the meeting yelling. It was theatrical and extremely absurd at the very least.

96. Following the orientation meeting, Wiley went into action and started directing "his team" to move Bitmain's miners into the data centers.

97. As this was happening, we (BCB) were just about to hire BCB's third local full-time team member, Melody Cheere.

98. In addition to Melody Cheere, we had additional staff ready to be hired. Over the preceding two months, I had collected over 80 resumes and interviewed more than 10 of those applicants.

99. BCB was hesitant to hire additional team members due to what Wiley had told me about MineOne removing BCB. BCB's executives did not want to hire more staff if BCB was going to be removed. Further, it seemed like MineOne was going to follow through on removing BCB because they were bringing a lot of Chinese people to the site to take over the operations and maintenance of the North Range site. What was happening was just as Wiley had said at dinner on February 27, 2023.

100. BCB reached out to MineOne to discuss and get approval on the Phase 2 budget – which was needed to pay new hires – but MineOne did not respond. By this point, the writing was on the wall—MineOne/TerraCrypto/BitOrigin were positioned to remove and replace BCB.

101. On the night of March 9, 2023, Defendants invited me to a third dinner. This time, it was Dr. Jiaming Li who invited me, not Wiley. I went to Dr Li's AirBnb at 2005 Coffee St. Cheyenne, WY 82007. Wiley was there too.

102. Wiley told me MineOne was going to “kick us (BCB) off the site!” He did not say when or how, just that it was going to happen.

103. Wiley made it clear he wanted me to stay a part of the project but the rest of BCB was being removed and replaced on the site. He also told me MineOne’s business partner had a site in Texas, and that I should come to Texas to see that site (*i.e.*, the Saluna site).

104. Over dinner and drinks, Dr. Jiaming Li explained “the opportunity” that he and MineOne wanted to offer me. Jiaming said he would send me “the opportunity” the next day in an email.

105. The following day, March 10, 2023, Dr. Jiaming Li sent me an email (*see* “**Exhibit B**”) and document (the “Investment and Cooperation Opportunity”) (*see* “**Exhibit C**”) for me to invest \$1.5 million or \$2.5 million in MineOne Wyoming and a commission payout for the number of bitcoin mining computers sold by me. Dr Li’s “opportunity” was an investment opportunity and commission sales pitch. They wanted my money and for me to be a part of their team. I notified Michael and Sean Murphy right away.

[The rest of this page is intentionally left blank]

FURTHER AFFIANT SAYETH NOT.

DATED this 19 day of March, 2024.

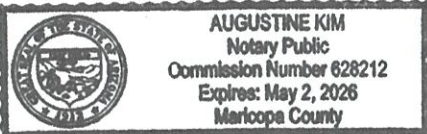

(SIGNATURE)

STATE OF ARIZONA)
)
COUNTY OF ~~WILL~~^{ALC} Maricopa)

Before me, a Notary Public in and for the County of Maricopa, State of Arizona, personally appeared Stephen Randall, this 19th day of March, 2024, and he being duly sworn by me upon his oath, says that the facts alleged in the foregoing instrument are true and correct.

Witness my hand and official seal: 
Notary Public

S
E
A
L



My Commission Expires: 05/02/2026